

## UNITED STATES DISTRICT COURT

for the  
Southern District of New York  
Southern Division

Abdullah, Abdul

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

NYPD 30th Precinct

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Case No.

M23651492

(to be filled in by the Clerk's Office)

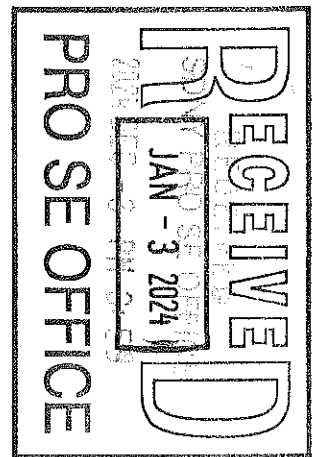
Jury Trial: (check one)



Yes



No



**COMPLAINT FOR VIOLATION OF CIVIL RIGHTS**  
 (Non-Prisoner Complaint)

**NOTICE**

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Abdullah Abdul  
 Address 1350 5th Ave  
New York NY 10026  
City State Zip Code  
 County Manhattan  
 Telephone Number 929-342-3525  
 E-Mail Address timebandit21@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name RANDY DELGADO  
 Job or Title (if known) P.O. (12464)  
 Address 451 W 151 St  
New York NY 10031  
City State Zip Code  
 County Manhattan  
 Telephone Number 212 690-8811  
 E-Mail Address (if known) NYPD 30th Precinct (@ NYPD 30 Pct)  
☐ Individual capacity ☒ Official capacity

**Defendant No. 2**

Name M. DUCASSE (97-2617)  
 Job or Title (if known) Police officer  
 Address 451 W 151 St  
New York NY 10031  
City State Zip Code  
 County Manhattan  
 Telephone Number 212-690-8811  
 E-Mail Address (if known) NYPD 30th Precinct (@ NYPD 30 Pct)  
☐ Individual capacity ☒ Official capacity

## Defendant No. 3

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Sergeant Smith

Police officer Sergeant

451 W 151 St

New York NY 10031

City

State

Zip Code

MANHATTAN

212-690-8811

NYPD 30th Precinct (@NYPD 30 Pct)

☐ Individual capacity☒ Official capacity

## Defendant No. 4

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

ETWAROO CHANDRADEO (941717)

Police officer lieutenant

451 W 151 St

New York NY 10031

City

State

Zip Code

MANHATTAN

212-690-8811

NYPD 30th Precinct (@NYPD 30 Pct)

☐ Individual capacity☒ Official capacity

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

By Violated Due due Process of the Law

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

by Depriving me of MY RIGHTS AND PRIVILEGES Protected by U.S  
CONSTITUTION

### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

Westbound 145 St Cross Street BROADWAY

- B. What date and approximate time did the events giving rise to your claim(s) occur?

12:45 PM ~~March~~ November 30 2023

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

AN ILLEGAL SEIZURE AND SEARCH OCCURRED  
KIDNAPPING AND FALSELY IMPRISON ME  
CONFISCATING MY AUTOMOBILE AND MY PERSONAL  
PROPERTY BY SERGEANT SIMITH OFFICER DELCADO,  
M. DUCASSE WITNESS BY MY NEPHEW GEORGIE

**IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

For Defamation of character

I WAS DEPRIVED OF WATER CAUSING DEHYDRATION  
SUBJECT TO UNSANITIZED CONDITION IN THE BATHROOM  
LOCK UP IN A COLD PRISON CELL WITHOUT SWEATER  
OR JACKET CAUSING FLU LIKE SYMPTOMS  
STAY AT HOME FOR TWO 2 WKS UNDER  
HOME CARE

**V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I WILL LIKE THE COURT TO COMPENSATE  
ME FOR MY PAIN SUFFERING THE SUM  
OF \$ 15,000.00 AND I WILL ALSO  
LIKE TO BE COMPENSATE THE AMOUNT OF  
\$ 15,000.00 FOR EMOTIONAL DISTRESS  
AND ALSO 20,000.00 FOR DEPRIVATION  
OF RIGHTS

THANK YOU

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Dec 26 2023

Signature of Plaintiff

Printed Name of Plaintiff

Abdullah Abdul H

ABDULLAH ABDUL H

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address

\_\_\_\_\_  
City State Zip Code

929-342-3525

TIME BAND H3118@gmail.com



38-220

USMPS  
SDNY

PRIORITY MAIL  
FLAT RATE ENVELOPE  
POSTAGE REQUIRED

FROM:

Nicholas, Abdul H

1200 5th Ave  
New York, NY 10026

NYC

10026 #44B

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US District Court  
Southern District  
of New York

Federal Courthouse  
500 Pearl St

Pearl St New York  
NY 10007

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OD: 12 1/2 x 9 1/2



PS00001000014

- Expected delivery
- Domestic shipping
- USPS Tracking
- Limited international
- When used

\*Insurance does not cover  
Domestic Mail Mail  
\*\* See International

FLAT RATE  
ONE RATE

